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ATTORNEY FOR RALPH LYLE CRUM

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

IN RE:	§	Case No. 08-20297-RLJ-7
	§	
RALPH LYLE CRUM,	§	Chapter 07
Debtor.	§	
	§	

**RESPONSE TO TRUSTEE'S MOTION TO COMPEL AND FOR TURNOVER**

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

COMES NOW, Debtor, Ralph Lyle Crum, files this response to Kent Ries, Trustee's Motion to Compel and for Turnover filed herein on May 21, 2009, and would show the Court as follows:

1. Admit.
2. Admit.
3. Admit.
4. Admit, that the code requires the Debtor to surrender all property of the estate, but deny that Debtor has failed to comply with any court order. The April 15, 2009 Order only adjudicated the issue of exemptions. There has been no motion for post-judgment relief of any kind.
5. Admit that the Debtor has appealed the April 15, 2009 Order, but deny that any stay has been requested. Debtor has been in contact with the Trustee, and the parties have

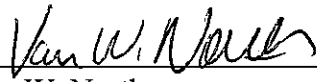
agreed to suspending any execution or expenditure of the disputed IRA funds until the appeal has been determined. Admit that no supersedeas bond has been posted or requested.

6. Admit that the Trustee mailed the referenced letter to Debtor, but unable to admit or deny that Group SAMA was sent a letter. Debtor denies that he has made any attempt to comply with the Trustee's request.
7. Admit that Debtor has provided no information in order to contact third party Trudy Hall, but deny that Debtor is required to provide such information absent a formal subpoena or discovery request in that regard.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Motion be denied, and that the Court enter an Order reflecting the parties agreement to cooperate in getting the disputed funds moved to the United States, and prohibiting transfer or expenditure of the funds by the parties pending appeal

Respectfully submitted,

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Van W. Northern  
State Bar No. 15101100  
*Attorney for Debtor*

**CERTIFICATE OF SERVICE**

The undersigned certifies that he has on the date shown below transmitted a true copy of the foregoing document to the following parties in interest by electronic notification via the court's electronic case filing system or by regular mail on the 10th day of June, 2009:

Chapter 7 Trustee

Mr. Kent Ries,  
600 s. Tyler, Suite 1300  
Box 12058  
Amarillo, Texas 79101

U.S. Trustee

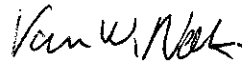
1100 Commerce Street  
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Dallas, TX 75242-1496

Attorney for Randi Crum

Coleman Young  
Templeton, Smithee, Hayes, Heinrich, & Russell, LLP  
P.O. Box 15010  
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Notices

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